

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
KELSEY J. HELLAND (CABN 298888)
Assistant United States Attorney
U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495

ERIC HAMILTON
Deputy Assistant Attorney General

DIANE KELLEHER

Branch Director

CHRISTOPHER HALL

Assistant Branch Director

JAMES D. TODD, JR.

Senior Trial Counsel

YURI S. FUCHS

GREGORY CON

Trial Attorneys

U.S. DEPARTMENT OF STATE

CIVIL DIVISION, FEDERAL PROGRAMS BRANCH

CIVIL DIVISION, FEDERAL PROGRAMS BRANCH
P.O. Box 883

P.O. Box 665
Washington.

Washington, DC 20044

Counsel for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*,

Plaintiffs

V.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT *et al*

Defendants

) Case No. 3:25-cv-1780-WHA

DECLARATION OF YURI S. FUCHS

I, YURI S. FUCHS, declare as follows:

1. I am a Trial Attorney in the United States Department of Justice and the attorney of record for Defendants in this action. I submit this declaration in support of the parties' Stipulation and [Proposed] Order to Amend Scheduling Order filed concurrently herewith. The facts set forth in this declaration are within my personal knowledge or based upon documents and information I have received in the course of this litigation.

2. Counsel for Defendants expect to be unavailable due to personal travel and annual leave during the period of June 3-19, 2025.

3. This is the parties' first joint request to modify the summary judgment deadlines in this matter. The parties also previously stipulated to continue the government's deadline to respond to the Complaint. *See* Dkt. No. 203.

4. The requested modification will directly affect the summary judgment schedule, which is the only current remaining event in this matter apart from Defendants' obligations under this Court's April 18, 2025 preliminary injunction. *See* Dkt. No. 202.

I declare under penalty of perjury under the laws of the United States that the above is true and accurate to the best of my information, knowledge, and belief. Executed this 1st day of May, 2025, in Washington, DC.

/s/ Yuri S. Fuchs
YURI S. FUCHS
Trial Attorney